



# Squires Waldspurger & Mace, P.A.

Jay T. Squires\*†  
Michael J. Waldspurger\*  
Amy E. Mace  
Trevor S. Helmers\*  
John P. Edison\*  
Liz J. Vieira\*  
Kristin C. Nierengarten  
Zachary J. Cronen  
Michael J. Ervin\*  
Abigail R. Kelzer

Tessa S. Wagner  
Marcus B. Jardine  
William M. Seiler  
Dalia N. Istephanous  
Molly M. Fischl  
Craig W. Hardie  
Shelby M. Borthwick  
Maxwell S. Blosser  
Jesse C. Peterson

\*Also Admitted in Wisconsin  
†Real Property Specialist Certified - MN State Bar Association

June 18, 2025

***via ECF FILING***

Hon. Judge Nancy E. Brasel  
United States District Court  
300 South Fourth Street  
Minneapolis, MN 55415

RE: *Kimball Area Public Schools, ISD No. 739 v. I.R.M., et al.*  
Court File No. 23-cv-02637 NEB/LIB

Dear Judge Brasel:

We write pursuant to the Court's June 11, 2025 request to provide the Court with an update in the above-referenced matter.

The Court resolved Plaintiff/ Counterclaim Defendant Kimball Area Public Schools, Independent School District No. 739's ("District") claims when it ruled on the parties' cross motions for judgment on the administrative record. *See generally* ECF Nos. 99, 100. The District will implement the IEP as described in its previous update dated May 14, 2025.

The District also intends to file a motion for summary judgment on Defendants/ Counterclaim Plaintiffs' counterclaims on or prior to June 30, 2025, the dispositive motion deadline in the Third Amended Pretrial Scheduling Order. *See* ECF Doc. 96 at 5.

Very Truly Yours,

*/s/ Liz J. Vieira*

Elizabeth J. Vieira  
William M. Seiler